

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION**

MARY QUESENBERRY, PAUL E.  
HOLLANDSWORTH, WALTER E. VIERS,  
CURTIS L. COX, ROBERT K. GOAD,  
SHIRLEY I. TOLBERT, on behalf of  
themselves and all others similarly situated;  
INTERNATIONAL UNION, UNITED  
AUTOMOBILE, AEROSPACE, AND  
AGRICULTURAL IMPLEMENT WORKERS  
OF AMERICA; and UAW LOCAL UNION  
2069,

Plaintiffs,

v.

VOLVO GROUP NORTH AMERICA, INC.  
f/k/a VOLVO TRUCKS NORTH AMERICA,  
INC. and VOLVO TRUCKS NORTH  
AMERICA RETIREE HEALTHCARE  
BENEFIT PLAN,

Defendants.

Judge James P. Jones

Magistrate Judge Pamela Meade Sargent

Civil Action No. 1:09-cv-00022

**DEFENDANTS' PROPOSED EXHIBIT LIST**

<b>Trial Exhibit No.</b>	<b>Deposition Exhibit No.</b>	<b>Description</b>	<b>Authenticity Stipulated Y/N</b>	<b>Preliminary Objections Y/N</b>
1	1	Retiree Health Care Benefits Letter [VOL 00002263 - 2266]		
2	2	Unpublished Letter - Retiree Health Care Caps, signed and dated by Stan Ellspermann and Philip Cabreros 12/5/98 [VOL 00008701 - 8703]		

3	16	Complete Listing of Attendees for the [2005] Kickoff [VOL 00006113]		
4	17	NRV Truck Plant Volvo/UAW 2005 Labor Negotiations - Proposal to Change Benefits: Pension Plan dated 1/21/05 [PL 0010300 - 10309]		
5	18	NRV Truck Plant Volvo/UAW 2005 Labor Negotiations – Proposal to Change Benefits: Pension Plan dated 1/21/05 [VOL 00006638 - 6648]		
6	21	Email from K. McLeod to T. Bressler et al. dated 2/7/2005 and attached Tentative Agreement [VOL 00003545 – 3550]		
7	24	Email from K. McLeod et al. dated 2/3/2005 and attached Tentative Agreement [VOL 00003551 – 3556]		
8	25	Summary of Benefits Agreement between NRV Plant of Volvo Trucks North America, Inc. and The International Union United Automobile, Aerospace & Agricultural Implement Workers of America (UAW) and Local UAW 2069, effective 2/1/05 through 1/31/08 [PL 00055502- 5512]		
9	26	Highlights of VTNA/UAW Tentative Agreement [VOL 00003541 - 3544]		

10	32	Memo to William Waters and Roger Susanin from Jack Widman and Kaye McLeod re: Status of Benefit Negotiations dated 2/1/08 [VOL 00002068 - 2079]		
11	38	Letter to Jack Widman from Michael Saggau (UAW) re: Retiree Healthcare [PL 0004528 - 4529]		
12	39	E-Mail to Michael Saggau from John Widman re: VEBA issue dated 6/7/08 [VOL 00004356 - 4358]		
13	42	VTNA Retirement Documents for Paul E. Hollandsworth		
14	43	VTNA Retirement Documents for Mary P. Quesenberry		
15	44	VTNA Retirement Documents for Robert K. Goad		
16	45	VTNA Retirement Documents for Glenn Lee Miles		
17	47	Notes dated 10-9-87 [PL 0001231 - 1236]		
18	48	UAW-Volvo Trucks, Highlights of Proposed New Agreement (January 1999-January 2005) [VOL 00007634 - 7646]		
19	49	Notes from Contract Negotiations dated 12/3/98 [VOL 00007496 - 7502]		

20	51	Agreement between NRV Plant of Volvo Trucks North America, Inc. and the International Union United Automobile, Aerospace & Agricultural Implement Workers of America (UAW) Production and Maintenance Employees Agreement effective January 29, 1999 through January 31, 2005		
21	53	Tentative Economic Agreement between UAW/VTNA – P&M dated 12/6/98 [PL 0001715 - 1723]		
22	57	Letter to All Volvo Truck North America UAW Bargaining Union Employees dated 2/28/05 [VOL 00006571 - 6574]		
23	58	“New Tentative Agreement – March 31, 2005”  [VOL 00007452]		
24	59	Summary of the UAW-Volvo Trucks 2005-2008 Tentative Agreement [VOL 00007365 - 7372]		
25	60	Appendix B, Welfare Benefit Program, Summary Plan Description  [Table of Contents – B127]		
26	61	Benefits Agreement between NRV Truck Plant of Volvo Trucks North America and International Union, United Automobile, Aerospace & Agricultural Implement Workers of America (UAW) effective March 17, 2008 through March 16, 2011 for Production and Maintenance Employees and Salaried Employees [Cover Page – B124]		

27	63	Handwritten Notes dated 1/12/05 [PL 0001381 - 1383]		
28	64	Handwritten Notes dated 1/20/05 [PL 0002003 - 2006]		
29	65	Handwritten Notes dated 01/25/2005 [PL 0001384 – 1392]		
30	68	Handwritten Notes Dated 1/29/2005 [PL 0002067 – 2068]		
31	69	“Proposal to Change Retiree Health Benefits Program” dated 2/1/2005 and signed by T. Bressler [PL 0006834 – 6836]		
32	70	White Motor Corporation Supplemental Agreements covering Benefit Plans between NRV Plant of White Motor Corporation and the UAW and its Local #2069 (1978-1981) [VOL 00000861 - 946]		
33	71	Volvo-White Local 2069 Insurance Table [PL 0014780]		
34	72	Volvo GM Heavy Truck Corporation, Your Employee Benefit Booklet for NRV Hourly Employees (1994-2000) [PL 0002751 - 2796]		
35	73	Collective Bargaining Proposals submitted to Volvo White by UAW [PL 0001784]		
36	74	Volvo White Truck Corporation 1984 Settlement Proposal dated 10/5/84 [PL 0001800, PL 0001810]		

37	80	Statement from UAW to Volvo GM Heavy Duty Truck re: Benefit Proposals dated 3/7/91 [PL 0011024 - 11031]		
38	83	Benefit Proposal – March 8, 1991 [VOL 00005208 - 5213]		
39	84	Highlights of the Proposed New Agreement for the Members of the UAW Local 2069 (April 2, 1991 through March 11, 1994) [VOL 00005680 - 5683]		
40	85	Statement from UAW to Volvo GM Heavy Truck, Benefit Proposals dated 2/18/94 [PL 0001304 - 1313]		
41	86	Statement from UAW to Volvo . . . February 28, 1994 [VOL 00005867 – 5860]		
42	88	Benefits Agreement re: Health Care dated 3/9/94 [PL 0001331 - 1340]		
43	89	Highlights of the Proposed New UAW-Volvo Heavy Truck 1994-2000 Conditional Agreement [PL 0001346 – 1361]		
44	90	Volvo GM Heavy Truck Corporation, Your Employee Benefit Booklet for NRV Hourly Employees (1994-2000) [Cover Page – 42]		
45	95	Volvo White Truck Corporation, Your Employee Benefit Booklet for NRV Hourly Employees (1984-1987) [VOL 00001080 - 1100]		

46	98	Letter to Walter I. McGrady from Volvo re: congratulations on retirement and benefits information dated 2/23/00		
47	99	1998 Negotiations – Basic Strategies [VOL 00008850 – 8855]		
48	100	CONFIDENTIAL – Labor Contract, VTNA/UAW Negotiations [VOL 00008732 - 8733]		
49	107	Handwritten notes from 12/2/98 pre-meeting [VOL 00009003 - 9008]		
50	109	Summary of 1999 Agreement [VOL 00009148 – 9155]		
51	117	Letter to Pamela Bratton from Mercer re: Volvo Group North America New River Valley Pension Plan George W. Epperly Jr. dated 6/12/07		

52	46	Company Proposal Settlement dated October 9, 1987  [PL 0001199 – 1201]		
53	55	Tentative Agreement – Benefits  [VOL 00007381 – 7386]		

Dated: February 23, 2010

Respectfully submitted,

/s/ Matthew J. Hank

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